



Defense Security Service FOCI FSO Conference

December 1, 2010



Drew Winneberger

Director, Industrial Policy & Programs



Agenda

09:00 – Welcome and DSS Update

Drew Winneberger, Director, Industrial Policy & Programs

09:30 – FOCI Operations Update

Stephen Hanson, Chief, FOCI Operations Division

10:00 – FOCI Oversight Update

Justin Walsh, Industrial Operations FOCI Program Manager

10:30 – Best Practices Discussion

11:30 – Lunch

13:00 – Targeting U.S. Technologies (CLASSIFIED SECRET/NOFORN)

Stephen Nemeth, DSS Counterintelligence

14:00 – FOCI Analytics Update

Lynda Mallow, Chief, FOCI Analytic Division

14:30 – Understanding FOCI Course – Steve Hanson

15:00 – DSS Panel Q&A



DSS Scope

DSS FY11 Budget: \$518.7M/1,030 personnel

DSS FY10 Budget: \$495M/862 personnel

COUNTERINTELLIGENCE

- 201 known or suspected collectors identified within industry
- 7,002 CI Suspicious Contact Reports
- 660 Intelligence Information Reports

INDUSTRIAL SECURITY

13,333 active, cleared facilities in NISP

- *Clear and inspect facilities*
- 9,448 inspections
- 1,279 new facility clearances granted
- 14,355 accredited systems in industry
- 23 Federal Partners



EDUCATION & TRAINING

DoD Functional Manager for Security Training

- 379,779 course completions since FY99
- 2,587% increase in course completions since FY00
- Catalog of 68 courses serving DoD and Industry
- 44% increase in course catalog since FY08
- 17,668 course completions by sponsored foreign nations

PROGRAMS & POLICY

- 702 FOCI facilities
- 286 FOCI mitigation agreements
- Support to 65 Foreign Countries



DSS 2015

January 2009 DEPSECDEF Guidance: Strengthen and refocus DSS on NISP and SETA Programs and ensure effective oversight/management of NISP

Oversee National Industrial Security Program (NISP)

- Reduce ratio of industrial security professionals to cleared facilities
- Enhance current Facilities of Interest List with additional CI and other risk factors
- Enhance current internal industrial security information management system
- Establish overseas presence
- Support DoD Cybersecurity initiatives

Deliver security education and training

- Establish the Security Professional Education Development Certification Program for the DoD Security Workforce
- Establish professional development and certification program for Industrial Security personnel
- Develop a post graduate level education program to develop security leaders
- Deliver training and other services to support DoD and Industry
- Stand up the Center for Development of Security Excellence
- Administer the DoD Personnel Security Adjudication Certification Program

Strengthen Counterintelligence in Industry

- Facilitate industry access to threat information
- Continue to integrate CI into Industrial Security Program
- Continue staff augmentation to tailor and expand CI services to Cleared Defense Contractors
- Continue CI and Law Enforcement Inter-agency community outreach

Provide Foreign Ownership, Control or Influence mitigation/international

- Refine processes of Foreign Ownership, Control or Influence (FOCI) analytic division to ensure proper reporting and develop trends in FOCI
- Develop financial analysis cell to assess FOCI by foreign investment entities
- Refine processes in FOCI Operations/International Branches
- Develop overseas presence policies and procedures

Provide information technology services

- Build next generation information systems
- Focus on managing data as an asset
 - Collect data once, use it many times
 - Enhance information sharing
- Leverage existing investments (e.g. ISFD or the new Infolink) as the foundation for future automation initiatives



DSS Successes FY10

- DSS CI referrals resulted in over 200 investigations or operations by federal law enforcement and intelligence agencies (increase of over 300 percent from FY09)
- Decreased FOCI case processing from 256 days to 120 days, decreased FOCI case backlog from 93 to 23
- Established tailored inspections for FOCI facilities and completed first corporate-wide review
- Created Facilities of Interest List which allows DSS to prioritize and tailor inspections
- Created Fusion Center to identify gaps in information and maximize collaboration across the agency
- Initiated beta test of SPeD program
- Sponsored DoD Security Manager's Conference (500+ security professionals)
- Transitioned legacy IT systems to Defense Manpower Data Center



DSS Priorities for FY11

- **Provide support to the cleared DIB to ensure they are effective in detecting and mitigating threats**
- **Develop and implement coordinated Cybersecurity strategy**
- **Continued integration of Counterintelligence into all aspects of DSS operations**
- **Resolution of FOCI cases**
- **Facilitate and complete BRAC-mandated moves**
- **Implement DoD Security Professionalization Certification Program**
- **Establish Insider Threat Program**
- **Expand tailored inspection program to freight forwarders, AA&E facilities**



Stephen Hanson

Chief, FOCI Operations Division



FOCI Developments & Objectives

- **FY10 Developments**

- e-FCL introduction, refinements
- New Electronic Communications Plan (ECP) Template
- ISOO Amendment to Directive 1 addressing NIDs
- New FOCI Annual Conference for FSOs
- Staff-assisted visits
- New FOCI training

- **FY11 Objectives**

- e-FCL available for DD 254s to expedite NIDs
- Preparation for DSS HQs BRAC move to Quantico
- New FOCI mitigation agreement templates



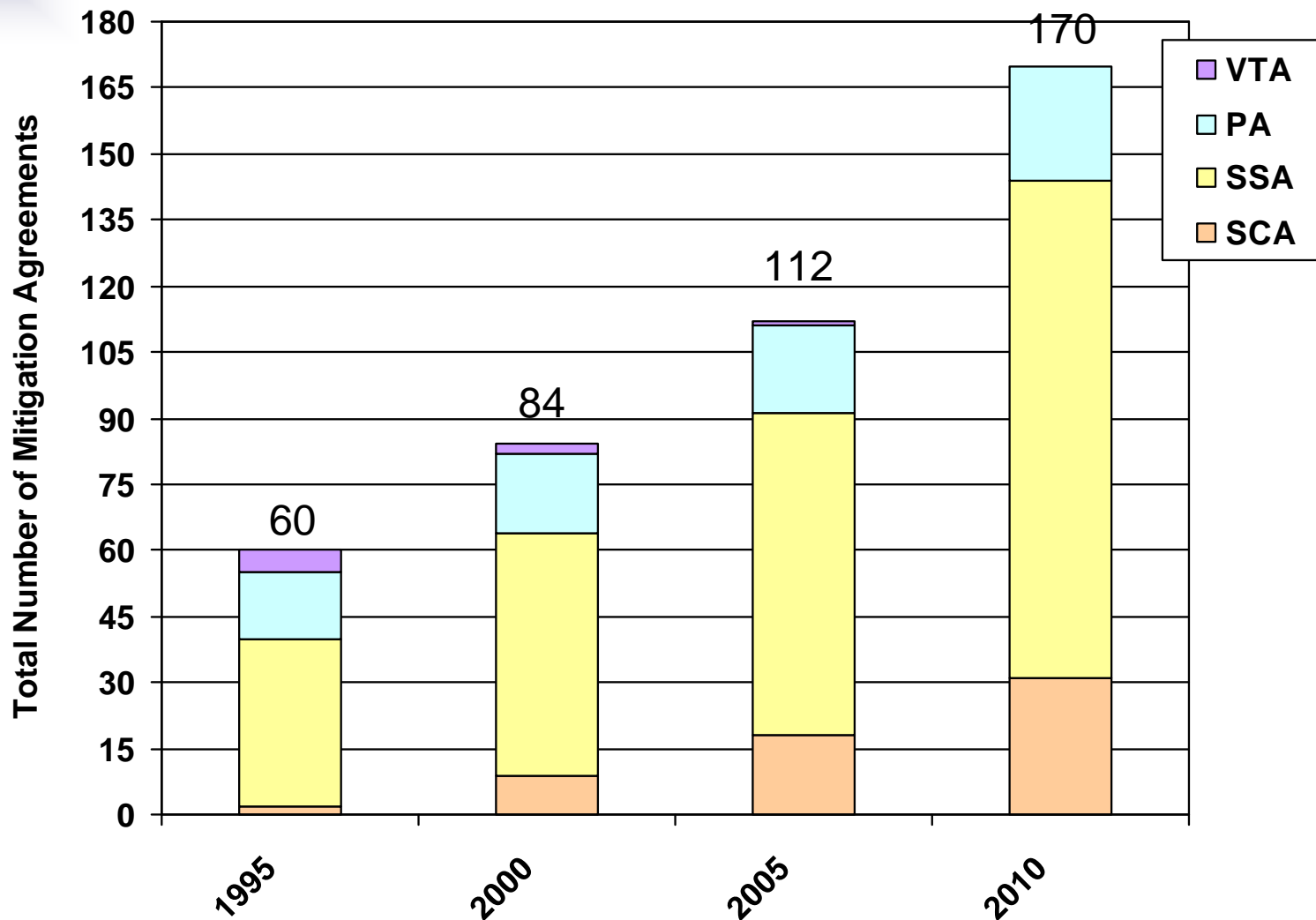
FOCI Statistics

- **NISP: 9,000+ companies, 13,000+ facilities**
- **FOCI: 286 mitigation agreements, 702 facilities**
 - 26 Proxy Agreements (9%), 94 facilities
 - 113 SSAs (40%), 318 facilities
 - 31 SCAs (11%), 51 facilities
 - 116 Board Resolutions (40%), 239 facilities
- **43 FOCI Cases Pending**
 - 24 SSA, 13 SCA, 6 Proxy Agreements
 - Goal is to Complete Cases in 120 Days



FOCI Mitigation Over Time

Total Number of FOCI Mitigation Agreements, 1995 - 2010





FOCI approaches for different company structures

- **Large Companies (40-100 cleared facilities)**
- **Large Companies with little cleared work**
- **Start-ups**
- **Greenfield Investments**
- **Joint Ventures (JV)**
- **Unpopulated Joint Ventures**
- **Bankruptcies**
- **Minority Foreign ownership**



Top FOCI concerns

- **Intentional control and influence over classified work resulting in unauthorized access**
- **Undue influence adversely affecting contract performance**
- **Restructuring without considering security requirements**
- **Foreign government control**
- **Unidentified indirect foreign ownership**
- **Foreign subsidiaries and affiliates under mitigation agreements**
- **Unreported material changes**
- **Government customer involvement**



Top FOCI Questions from Industry

- **Visit Requests and Contact Reports**
- **Annual Reports**
- **Shared Services**
- **Co-location**
- **National Interest Determinations**
- **Renewals**
- **Electronic Communications Plan (ECP)**



Advance Approval of Visits

- Seven-day advance notice required except for 'unforeseen exigencies' - any urgent situation
- SSA XI, 11.03 - A written request for approval of a visit must be submitted to the FSO no less than seven (7) calendar days prior to the date of the proposed visit. If a written request cannot be accomplished because of an unforeseen exigency, the request may be communicated via telephone to the FSO and immediately confirmed in writing.
- Proxy Agreement XI, 11.01c - A written request for approval of a visit must be submitted to the FSO not less than seven (7) calendar days prior to the date of the proposed visit. If any unforeseen exigency precludes compliance with this requirement, such request may be communicated via telephone or other electronic means to the FSO and promptly confirmed in writing...
- ODs/PHs can approve many at one time, as long as individual justifications are reviewed.



National Interest Determinations

- **About 42 SSAs require National Interest Determinations (NIDs)**
 - 564 proscribed contracts under SSAs require NIDs.
 - 134 NIDs approved.
 - 85 new contracts being performed which await NID approval.
- **Government Contracting Activity (GCA) makes determination**
 - Government customer assesses whether release of the proscribed information is consistent with U.S. national security interests.
- **Timeline for approval in 32 CFR 2004.22 (c).**
 - 30 days for GCA to approve NID; 60 days for GCA if additional coordination with originating agencies is required (ODNI for SCI, DOE for RD, etc.).
 - DSS shall intercede to request again if deadline passes.



New DD-254 Submission via e-FCL

Initial Package - Windows Internet Explorer

https://submission.dssfd.anl.gov/dsssub/uframe.page#%2Forganizations%2FD0FA2BCE%2Fpackages%2F1%2Fsteps%2F2

File Edit View Favorites Tools Help

Initial Package

U.S. DEPARTMENT OF DEFENSE
ELECTRONIC FACILITY CLEARANCE SYSTEM
DEFENSE SECURITY SERVICE INDUSTRIAL SECURITY PROGRAM
SUBMISSION SITE

Lodin Enterprises

Initial Package

STEP 2 Upload Documents

Help
Log Out
My Account
Select an Organization
Organization
Initial Package

SUBMISSION SITE

Files to be Uploaded

Articles of Organization	Incomplete	!	+
Operating Agreement	Incomplete	!	+
Company Structure Org Chart	Incomplete	!	+
DD254	Incomplete	!	+
<input type="checkbox"/> The DD254 documents do not apply to this organization			
Upload DD254 Document			
DD441: DoD Security Agreement	Incomplete	!	+
DD441-1: Appendage to DoD Security Agreement	Incomplete	!	+
Excluded Parent Documents	Not Required	+	+
Miscellaneous Documents	Not Required	+	+

1 2 3 4 5



FOCI Oversight

Justin Walsh

**FOCI Program Manager
Industrial Security Field Operations**

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Briefing Objectives

- FOCI Oversight Numbers
- Reasons for poor security ratings at FOCI Facilities
- ECP Timelines and Oversight
- Outside Director and Proxy Holder responsibilities
- What you should expect during a DSS Inspection.



FOCI Oversight Data

- Since 1 Oct 2008, DSS has conducted 20,067 security inspections
- 559 of which were FOCI signatories
- Non-FOCI signatories Compliance Breakdown:
 - 80.3% rated Satisfactory
 - 15% rated Commendable
 - 4% rated Superior
 - 0.7% rated Marginal or Unsatisfactory
- FOCI Signatory Compliance Breakdown:
 - 77% rated Satisfactory
 - 16% rated Commendable
 - 4% rated Superior
 - 3% rated Marginal or Unsatisfactory



Reasons for Poor Security Ratings

- Foreign Parent Management Control
- Unauthorized Co-location
- Shared services occurring without approval
- Inadequate ECP/TCP Implementation
- Inadequate monitoring of electronic communications
- Interlocking Directors that were not disclosed or approved
- No separation of IT network
- Disclosure of export controlled information to the foreign parent without export authorization



Reasons for Poor Security Ratings

- Failure to submit an Annual Compliance Report
- Failure to Monitor/Approve/Document Visits
- Total lack of implementing the SSA and Proxy
- Lack of Training with regards to TCPs, ECPs, Agreement
- Inadequate/failure to Report (transfer of export material, communications)
- Compensation committee consisting of just the Inside Director



FCL Invalidations of FOCI Companies

- Since 1 Oct 2008, DSS has invalidated 54 facility clearances (FCLs).
 - 14 of those invalidations were FOCI Signatories (26%)
 - Of the 9,000+ Companies in the NISP there are 261 FOCI signatories (less than 3% of the companies in the NISP)
 - Reasons for invalidations of FOCI companies:
 - » FOCI Changed Conditions where DSS and the company could not agree on acceptable mitigation. (36%)
 - » FOCI Compliance Issues (64 % - see previous slides)



ECP Composition

What should an ECP look like?

Template dated March 2010

- Network
- System Description/Technical Overview/Network Diagram
- Identification and Authentication Policy & Procedures
- Access Control Policy
- Remote Access
- Security Awareness/Training
- Auditing
- Monitoring
- Incident response & handling
- Physical Environment & protection
- Maintenance
- Media Protection

- Identification/phone/email address of FSO, TCO, IT Personnel, Outside Director and their roles

- Employee Acknowledgement briefing

- Export Release Forms



ECP Composition

- Telephone
- Video Teleconferencing (VTC)/Teleconferencing (TC)
- Facsimile
- Cell Phones
- PDA
- All computer communication emails and server access

NOTE: VTC/TC logged in as Visits under VCP



Timelines on Implementation of ECP

- At what point will a company need to submit an ECP?
Instructions were provided to industry on the DSS website June 28, 2010:
- Companies in FOCl mitigation process must be in compliance with the new ECP template within 45 days of Agreement execution.
- Effective September 1, 2010: Signatory companies already cleared under an applicable FOCl agreement are required to be in compliance by their next annual security inspection.
- Branch/Subsidiary/Division sites will need to have a site specific ECP within 45 days from the date the signatory facility's ECP was approved.



Timeline on Implementation of the ECP

- ECPs are approved by the Field Office Chief after:
 - Coordination and review between the ISR, ISSP and Region Senior Action Officer
 - On-Site Visit by an ISSP
 - Coordination with the Company to ensure that the ECP is an accurate depiction of their network and procedures
 - ECP approval must be in writing
 - Approved 45 days from the date of submission



What to Expect From The Field

- Inspections and Annual Meetings conducted on time every cycle. Inspection results and findings conveyed in a timely manner
- ECP Assistance
- Inspection teams consisting of the ISR, Sr. Action Officer specializing in FOCl, ISSP, and Field Counterintelligence Specialist.
- Continued Implementation of Corporate Wide Inspections
- Better communication across regions.
- Oversight Consistency



Lynda Mallow

Chief, FOCI Analytic Division



FOCI Analytic Division

Initial Mission: Created to ensure all available data is analyzed and applied when determining acceptable risk mitigation strategies for companies under FOCI

- Reviewed SF328s for those reporting FOCI

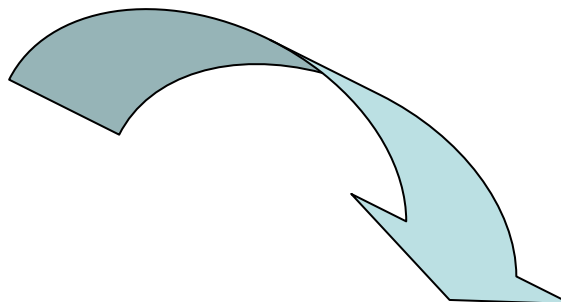
Enhanced Mission: Ensure all available data is analyzed and applied to all NISP facilities to ensure all FOCI is identified and mitigated

- Reviewing all SF328s regardless of response

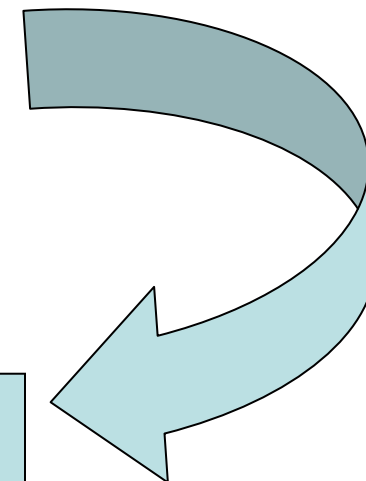


FOCI Analytic Division

**Company data into e-FCL
– coordination with the
Industrial Security
Representative (ISR)**



**Completed
packages are sent
to the Field Office
Chief and the FAD**



**Review of all
SF328s by FOCI
Analytic Division**





FOCI Analytic Division

Identification and Analysis of FOCI

Review Completed Packages to Ensure Correct and Complete Responses

- Review various business databases: Hoovers, SEC, D&B, etc.
- Review various open sources: Justice, State, Company Website, etc.
- Review classified resources, to include DSS/CI holdings
- Tap into financial expertise of DSS' Assessments and Evaluation Division

ELECTRONIC FACILITY CLEARANCE SYSTEM
DEFENSE SECURITY SERVICE INDUSTRIAL SECURITY PROGRAM PROCESSING SITE

DSS/HQFOCI

Modules
Site Utilities
Resources
Company Information
Log Out

Quick Search

Processing Module
Analysis Wizard
Select a Package
Package Summary

SF328 Question 1 SF328 Attachment 1a Corporate Documents Threshold Info

1. (Answer 1a. or 1b.)

a. (For entities which issue stock): Do any **foreign person(s)**, directly or indirectly, own or have **beneficial ownership** of 5 percent or more of the outstanding shares of any class of your organization's **equity securities**?

b. (For entities which do not issue stock): Has any **foreign person** directly or indirectly subscribed 5 percent or more of your organization's **total capital commitment**?

My Analysis SF 328 Question 1 Instructions

Entry (Not Saved)



FOCI Analytic Division

Created Repository For FOCI Data

The screenshot displays the 'Testing' form within the 'DSS Facility Information - Umbrella' application. The form is organized into several sections:

- Facility Information:** Fields for Facility (Testing), Cage (12345), Office (IOFWM), City (Rancho Santa Margarita), and State (CA).
- Inspection Data:** Fields for Inspection Date, Inspection Result, FOCI Mitigation, FCL Status (Active), FCL Level (Secret), and Safeguarding (Secret).
- Controls:** Checkboxes for ISFD, Hoovers, and SEC.
- DSS Facility Parent:** A detailed section for facility parent information, including Date SF-328, Accuracy SF-328, Relationship To Company Holding Agreement, Foreign Interest, and a table for Foreign Interest details.

The bottom of the form shows a record count of 1 of 672.

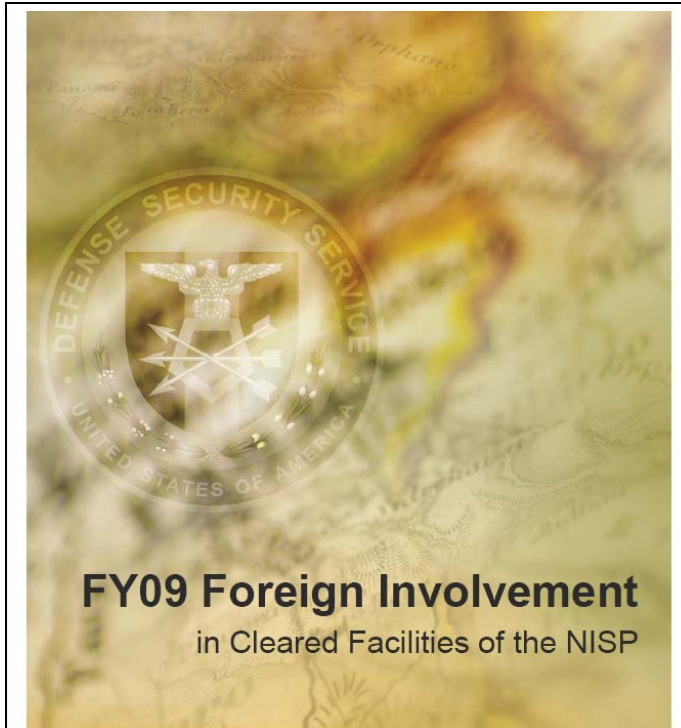
Data Points

- Cage/name
- Complete mitigation information
- Identification and type of FOCI
- NAICS/technology



FOCI Analytic Division

**Based on FOCI database,
FAD prepared a
compilation of datapoints**



- **Countries involved**
- **Number and types of mitigation**
- **Types of entities with involvement**



FOCI Analytic Division

“Any material change concerning the information previously reported by the contractor concerning foreign ownership, control or influence (FOCI). This report shall be made by the submission of a Certificate Pertaining to Foreign Interests.” (Source: NISPOM 1-302)

Further clarified by an Industrial Security Letter (ISL) published November 17, 2009 which provides a matrix describing circumstances that businesses are required to report on the SF328.

www.dss.mil contains a wealth of information, to include all ISLs





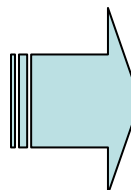
FOCI Analytic Division

Monitoring NISP Facilities

- Created a Portal which continually runs a search of the names of all NISP facilities against various RSS feeds from business news sites
- FAD Analysts review portal news for their assigned field offices on a daily basis
- Significant material changes are reported in NISP in the NEWS for internal use

The screenshot shows the FOCI One View Portal interface. The top navigation bar includes links for Home, RSS, NewsWatch, Search, Admin, and Help. A sidebar on the left lists various RSS feeds such as Edgar Latest Filings, SEC, Reuters Deals News, Reuters Business News, Reuters Mergers News, Private Equity News, BBC Business, Forbes News, Forbes Markets, Market Watch, Google News, Yahoo Business, and Wall Street Journal. The main content area displays a list of news items, each with a checkbox, a number, and a title. The items are as follows:

Item	Number	Title
100322	2	AEGIS FUNDS (Filer)* Form 24F-2NT - Rule 24F-2 notice SEC Accession No. 0001387131-10-000324 Filing Date 2010-03-22 Accepted 2010-03-22 17:03:
100318	3	UPDATE 2-Aegis appoints CEO, issues new bond for acquisitions * Proposes to issue up to a 195 mln stg convertible bond<div class="feedflare"> <a href="http://feeds.reuters.com/~ff/reuters/
100318	4	Aegis appoints new CEO as profit declines 24% <p>LONDON (MarketWatch) -- U.K. media and market research firm Aegis Group said Thursday that its 2009 net profit fell 24% to 62.7 million pounds (\$96 million) as it also appointed a new CEO. The group said Jerry Buhlmann will become CEO f
100310	5	TEL AVIV (MarketWatch) -- Bruker Corp., definitively agreed to acquire certain product lines of Varian Inc. In a late-Tuesday statement, Varian said that as part of its agreement to be acquired by Agilent Technologies Inc., Agilent had agreed to divest th TEL AVIV (MarketWatch) -- Bruker Corp., /quotes/comstock/15"lbrkr (BRKR 13.95 , -0.36, -2.52%) definitively agree
100218	6	Network hardware maker Ixia reported Thursday that its fourth-quarter loss widened as a large write-down more than offset a jump in revenue from recent acquisitions. CALABASAS, Calif. - Network hardware maker Ixia reported Thursday that its fourth-quarter loss widened as a large writ
100212	7	COACHMEN INDUSTRIES INC (Subject)* AEGIS FINANCIAL CORP (Filed by)* Form SC 13G - Statement of acquisition of beneficial ownership by individuals SEC Accession No. 0001387131-10-000179 Fi
100212		AEGIS FINANCIAL CORP (Filed by)* Bofl Holding, Inc. (Subject)*



NISP IN THE NEWS

An assessment of current open source information that may impact current status of cleared facilities in the NISP

Compiled by the FOCI Analytic Division for the week of: **November 1, 2010**



QUESTIONS?

Lynda Mallow, Chief, DSS FOIC Analytic Division

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703-325-5797



Stephen Hanson

Chief, FOCI Operations Division

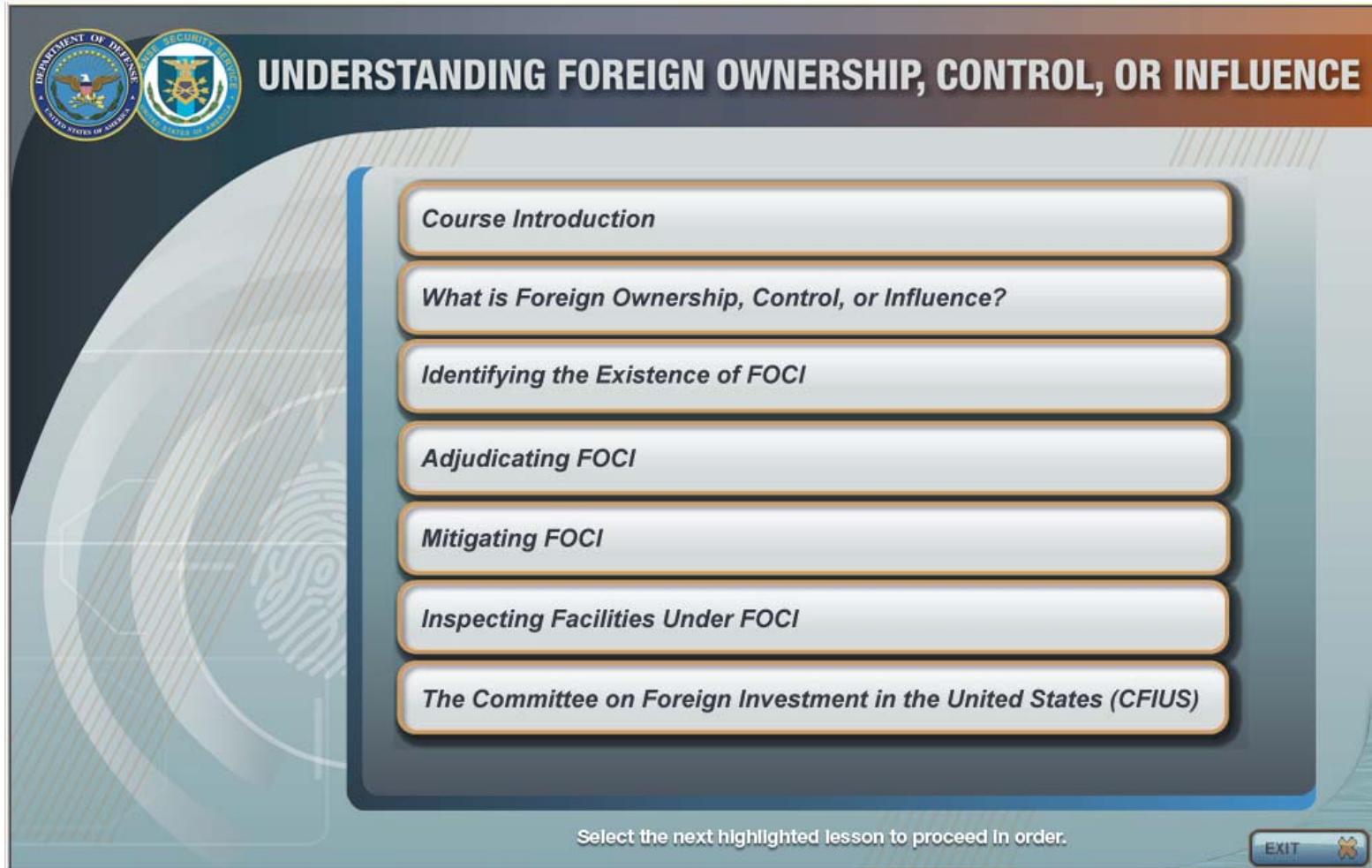




Understanding FOCl Course

- Course developed by the DSS Center for Development of Security Excellent (CDSE) to enable the student to more fully understand what foreign ownership, control or influence (FOCI) is and to understand the procedures and steps involved in determining whether a company is under FOCI.
- Web-based and accessed through the DSS ENROL system.
- Approximately 3 hours in length and includes learning exercises and final exam.
 - Certificate produced after successful completion of the course.
- When is it available?
 - Currently in BETA testing.
 - Implementation expected 2nd Quarter FY11.
 - Notification email will be sent to FOCI FSOs when course is available. Email will include ENROL access information.
 - Notification will also be made on the dss.mil website.




Understanding FOCI Course

The image shows a screenshot of a course menu for "Understanding Foreign Ownership, Control, or Influence". The menu is displayed on a dark blue background with a large, stylized fingerprint graphic on the left. The title "UNDERSTANDING FOREIGN OWNERSHIP, CONTROL, OR INFLUENCE" is at the top in white. Below the title are seven menu items, each in a white rounded rectangle with a blue border. The first item, "Course Introduction", is highlighted with a blue background. At the bottom, there is a instruction "Select the next highlighted lesson to proceed in order." and an "EXIT" button with a small icon.

  **UNDERSTANDING FOREIGN OWNERSHIP, CONTROL, OR INFLUENCE**

- Course Introduction*
- What is Foreign Ownership, Control, or Influence?*
- Identifying the Existence of FOCI*
- Adjudicating FOCI*
- Mitigating FOCI*
- Inspecting Facilities Under FOCI*
- The Committee on Foreign Investment in the United States (CFIUS)*

Select the next highlighted lesson to proceed in order.

EXIT 



Understanding FOCI Course

- Introduction Module
 - Software/Hardware requirements
 - Student guides
 - Navigation help
- Module 1 - What is FOCI?
 - Objectives
 - Define the meaning of FOCI and explain what it means for a company to be considered under FOCI.
 - Identify the roles and responsibilities of government and contractor personnel involved in the FOCI process
 - Identify the phases of the FOCI process





Understanding FOCI Course

- Module 2 – Identifying the Existence of FOCI
 - Objectives:
 - Identify and explain the seven FOIC factors
 - Define the sources and documents used to identify FOIC.
 - Explain how to complete the Certificate Pertaining to Foreign Interests (SF-328)

UNDERSTANDING FOREIGN OWNERSHIP, CONTROL, OR INFLUENCE
Identifying the Existence of FOIC

11020000215

Add Comment

Identification

Corporate Family Tree
The corporate family tree outlines the company subsidiaries and parent companies.

SHOW TEXT COURSE MAP RESOURCES GLOSSARY EXIT REPLAY

UNDERSTANDING FOREIGN OWNERSHIP, CONTROL, OR INFLUENCE
Identifying the Existence of FOIC

11020000215

Add Comment View Comments

The SF 328

QUESTIONS AND ANSWERS

QUESTIONS AND ANSWERS	YES	NO
1. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
2. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
3. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
4. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
5. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
6. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
7. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
8. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
9. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
10. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
11. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	
12. Does the firm or its subsidiaries (or other entities) own or control (or have the potential to own or control) 10 percent or more of the outstanding shares of any class of your organization's equity securities?	X	

SHOW TEXT COURSE MAP RESOURCES GLOSSARY EXIT REPLAY

5 of 12



Understanding FOCI Course

- Module 3 – Adjudicating FOCI
 - Objectives:
 - Describe the SF-328 adjudication process
 - Describe the FOCI adjudication issues activities that occur at the DSS local, regional and headquarter levels.





Understanding FOCI Course

- Module 4 – Mitigating FOCI
 - Objectives:
 - Identify the FOCI mitigation agreements and instruments.
 - Explain the purpose of the National Interest Determination (NID).
 - Explain the purpose of the Limited Facility Clearance.





Understanding FOCI Course

- Module 5 – Inspecting Facilities Under FOCI
 - Objectives:
 - Describe the requirements associated with the initial meeting.
 - Describe the purpose of the annual compliance certification.
 - Identify the annual implementation and reporting requirements for companies under different FOCI agreements.
 - Explain the purpose of the annual inspection.
 - Describe the purpose of the annual compliance meeting.





Understanding FOCI Course

- Module 6 – The Committee on Foreign Investment in the United States (CFIUS)
 - Objectives:
 - Describe the main components of the CFIUS.
 - Define the CFIUS review actions and activities.



<http://manage.c2i.com/review/FOCI/module7/lesson1/m71070.html?ModuleCompleted=module6&CourseFirstTime=false>





Understanding FOCI Course

